

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14-10

ECONOCARIBE CONSOLIDATORS, INC.

COMPLAINANT

v.

AMOY INTERNATIONAL, LLC.

RESPONDENT

MOTION TO EXTEND TIME TO FILE PROPOSED FINDINGS OF FACT AND BRIEF

Pursuant to Section 502.222 of the Federal Maritime Commission's Rules of Practice and Procedures, Complainant Econocaribe Consolidators, Inc., seeks an order extending the time to file Complainant's proposed findings of fact and brief to Thursday, April 2, 2015.

The reasons for the request are as follows. First, a motion to compel discovery is currently pending and a request for oral argument was filed on February 25, 2015. Without the completion of discovery, the proposed findings of fact would be incomplete. Second, parties are still in the process of mediation, being facilitated by the office of Consumer Affairs & Dispute Resolution Services. It appears that the best use of counsel's time would be focus on the mediation because a successful settlement agreement would make parties' proposed findings of fact and briefs unnecessary. Counsel for Respondent, Joseph N. Mirkovich, Esq. does not agree to this request. However, Amoy cannot put Econocaribe to a disadvantageous position by

refusing to produce discovery while insisting Econocaribe file proposed findings of fact without complete factual support.

Econocaribe further proposes the following changes to the Scheduling Order dated October 2, 2014 as follows:

- April 2, 2015 Complainant files proposed findings of fact and brief with appendix
- May 2, 2015 Respondent files proposed findings of fact and brief with appendix
- May 16, 2015 Complainant files reply brief

Econocaribe respectfully requests Commission to grant the above mentioned changes.

Dated February 25, 2015

Respectfully submitted,

THE MOONEY LAW FIRM, LLC



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IT IS SO ORDERED

Dated: _____, 2015

Erin M. Wirth
Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that the original and appropriate number of copies of the foregoing **Motion To Extend Time To File Proposed Findings of Fact and Brief** were sent by U.S. mail to the Commission on February 25, 2015 and that a copy was also emailed to the Commission on that date.

I certify that a true and correct copy of the foregoing **Motion To Extend Time To File Proposed Findings of Fact and Brief** was served on the below-mentioned counsel via U.S. Mail and Email on February 25, 2015.

Karen V. Gregory, Secretary
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